



GALLET DREYER
& BERKEY, LLP

August 11, 2021

Via email: kk@gs2law.com

Kevin Kehrli, Esq.

Garson, Segal, Steinmetz, Flagate LLP

164 West 25th Street, Suite 11R

New York, NY 10001

Re: Norris v. Goldner et al. 19 cv 5491 (AJN)

Mr. Kehrli,

I write in response of your deficiency letter of August 2, 2021. Should you wish to schedule a “meet and confer” to further discuss, I am available at your convenience.

Defendants’ Request No. 2.

Without waiving Plaintiff’s objections and subject to them, please visit https://gdblawnlp-my.sharepoint.com/:f:/g/personal/fmp_gdblawnlp-my.sharepoint.com/ErenK48Y19dItCZINvLRzwIBRsb6tzB-hneFw7t3wMQoFw?e=VO3PBq to access the responsive documents.

Defendants’ Request No. 3.

In addition to the current objections, Request No. 3 is overly broad and burdensome as it seeks communications between “your client and any artist who contributed artwork for any of the Works or related to Golden Bell.” Plaintiff was the only artist who created artwork for the game tentatively entitled “Webcomic Name Game.” Notwithstanding these objections and subject to them, Plaintiff will provide documents responsive to this request, to the extent these documents exist provided Defendants narrow the scope of this request.

Defendants’ Request No. 4, 5 and 7.

Without waiving the current objections and subject to them, Plaintiff’s position is that the documents responsive to these requests do not exist.

Defendants’ Request No. 13.

Without waiving the current objections and subject to them, please use https://gdblawnlp-my.sharepoint.com/:f:/g/personal/fmp_gdblawnlp-my.sharepoint.com/ErenK48Y19dItCZINvLRzwIBRsb6tzB-hneFw7t3wMQoFw?e=VO3PBq to access the responsive documents.

Sincerely,

s/ Francelina M. Perdomo

Francelina M. Perdomo

